REMARKS

Claims 1-23 have been rejected. No new matter has been added.

35 U.S.C. § 102(b) Rejections

Rejections of Claims 1-16

Claims 1-16 have been rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent No 6,055,526 (Ambroziak). Claims 1-16 contains features that are neither taught nor suggested by the prior art of record. As illustrated by independent claim 1:

> A system for compression comprising:
>
> a memory device that stores a plurality of compressed and uncompressed normalized index keys in sorted order, with no gaps between the stored normalized keys, and stores a plurality of slots with no gaps between the stored slots; and
>
> a processor that compresses the stored normalized keys.

Ambroziak purports to teach a method for compressing an index to obtain a compressed index that can be easily stored an transmitted (Ambroziak, Abstract). An index is maintained for each document, allowing for easy updating of indexes in response to changes in documents and easy transmission of indexes (Id.) The system provides a compact index that is at the same time able to be processed rapidly (Id.).

Ambroziak fails to teach several of the features of independent claim 1, and therefore cannot possible anticipate the claim. First, Ambroziak fails to teach **a memory device that stores a plurality of compressed and uncompressed normalized index keys in sorted order.** The Examiner states that this feature is taught at column 16 lines 37-39. Applicants respectfully disagree. The cited portion merely describes how documents are organized to form concept identifier groups. Applicants respectfully submit that concept identifiers are not index keys, and even if they were, there is no teaching that they are compressed.

Second, Ambroziak fails to teach **storing the normalized keys with no gaps between them.** The Examiner states that this feature is taught at column 9 lines 49-50. Applicants respectfully disagree. The cited portion merely describes how the files are stored in a compressed form. There is no mention of keys nor storing without gaps in the cited portion. Compressing files does not necessarily suggest they are stored without gaps.

Third, Ambroziak fails to teach **storing a plurality of slots with no gaps between the stored slots.** The Examiner states that this feature is taught at column 1 lines 52-58. Applicants respectfully disagree. The cited portion makes no mention of slots at all.

Because Ambroziak fails to teach or suggest each element of claim 1, it cannot possibly anticipate it. Applicants respectfully request that the Examiner withdraw the rejection and allow claim 1.

Independent claim 9 contains similar features as independent claim 1, and is therefore allowable for the same reasons given for claim 1 above. Applicants respectfully request that the Examiner withdraw the rejection and allow claim 9.

Dependent claims 2-8, and 10-16 are all variously dependent on independent claims 1, and 9, and are therefore allowable for at least the reasons given above for the independent claims. Applicants respectfully request that the Examiner withdraw the rejections and allow claims 2-8, and 10-16.

Rejections of Claims 17-19

Claims 17-19 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Ambroziak. Claims 17-19 contains features that are neither taught nor suggested by the prior art of record.

Independent claim 17 includes the feature of **comparing the first normalized index key with a second normalized index key preceding the first normalized index key in the memory page.** The Examiner states that Ambroziak teaches such a feature at column 17, lines 22-31. Applicants respectfully disagree. The cited portion of Ambroziak teaches the use of various tables to determine which C/P groups should be decompressed. There is simply no description whatsoever of an index key, nor comparing an index key with an index key stored in memory.

Because Ambroziak fails to teach or suggest each element of claim 17, it cannot possibly anticipate it. Applicants respectfully request that the Examiner withdraw the rejection and allow claim 17.

Dependent claims 18 and 19 are all variously dependent on independent claim 17, and are therefore allowable for at least the reasons given above for the independent claim. Applicants respectfully request that the Examiner withdraw the rejections and allow claims 18 and 19.

Rejections of Claims 20-23

Claims 20-23 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Ambroziak. Claims 20-23 contains features that are neither taught nor suggested by the prior art of record.

Independent claim 20 includes the feature of **a third data field containing a plurality of slots, each slot corresponding to a normalized index key in the second data field.** The Examiner states that Ambroziak teaches such a feature at column 14, lines 30-38. Applicants respectfully disagree. The cited portion of Ambroziak teaches the format of the C/P group, but makes no mention of slots, or slots corresponding to a normalized index key.

Because Ambroziak fails to teach or suggest each element of claim 20, it cannot possibly anticipate it. Applicants respectfully request that the Examiner withdraw the rejection and allow claim 20.

Dependent claims 21-23 are all variously dependent on independent claim 20, and are therefore allowable for at least the reasons given above for the independent claim. Applicants respectfully request that the Examiner withdraw the rejections and allow claims 21-23.

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